UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: ASBESTOS PRODUCTS	§	
LIABILITY LITIGATION (No. VI)	§	Consolidated Under
	§	MDL DOCKET NO. 875
	§	
This Document Relates to:	§	
	§	Civil Action No. 2:09-cv-62581-ER
Herbert Pease	§	
	§	(transferred from
v.	§	No. 1:08-cv-00624-JAP D (Del.))
	§	
A.W. Chesterton Co., et al.	§	
	§	
	§	

JOINT DISCOVERY PLAN

COME NOW Plaintiff Barbara Pease-Kinsey on Behalf of the Estate of Herbert Pease, and Defendants A.W. Chesterton Company, et al., and file this their Joint Proposed Discovery Plan in the above-referenced matter. Attached hereto as Exhibit "A" is the parties' Proposed Discovery Plan.

WHEREFORE, the parties request that this Court enter an order establishing the deadlines outlined in the parties' discovery plan.

Respectfully submitted,

/s/ G. Sean Jez

BY: G. Sean Jez, PA # 205330 FLEMING & ASSOCIATES, L.L.P. 1330 Post Oak Boulevard, Ste 3030 Houston, TX 77056

Telephone (713) 621-7944

Fax: (713) 621-9638

Email: sean_jez@fleming-law.com
ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I hereby certify that all Defendants in this matter were served a copy of the parties' Joint Discovery Plan on June 12, 2009, via regular mail, electronic mail or fax, as follows:

Paul A. Bradley
MARON MARVEL BRADLEY & ANDERSON, PA.A.
1201 N. Market Street, Suite 900
P.O. Box 288
Wilmington, DE 19801
FOR ALL DEFENDANTS

/s/ G. Sean Jez G. Sean Jez